

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK

U.S.D.J. 9/18/2023

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The stay in this action shall be maintained pending further action of the Court. The parties shall submit a further status letter on October 2, 2023.

September 15, 2023

VIA ECF ONLY

Hon. Vernon S. Broderick, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: *TLC Travel Staff, LLC et al. v. Ace Funding Source, LLC, et al.*
United States District Court for the Southern District of New York
Case No.: 1:23-cv-01914(VSB)

Dear District Judge Broderick:

We represent Plaintiffs in the above-referenced action. We write, with the consent of opposing counsel, to provide a brief status update and respectfully request an extension of the present stay until Monday, October 2, 2023.

As Your Honor may recall, on July 6, 2023, Plaintiffs and certain Stipulating Defendants requested a stay to finalize a settlement agreement that would resolve some, but not all of the claims at issue in this action. Since that time, we have been working with opposing counsel and the proposed settlement has been revised and modified. More recently, the parties reached an agreement as to the material terms of a settlement that would resolve *all* claims in this action, and we are in the process of drafting and circulating same. In light of the foregoing, we respectfully, jointly, request that the stay be extended to allow the parties the time to resolve this action without further litigation.

We thank Your Honor for your continued attention to this action.

Respectfully submitted,

REPPERT, KELLY & VYTELL, LLC

/s/ *Nicholas A. Vytell*
Nicholas A. Vytell

Cc: All counsel (via ECF only)